

**ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE  
ENVIRONMENTAL RESTORATION  
REGULATORY CONTACT RECORD**

---

**Date/Time:** May 15, 2003

**Site Contact(s):** Susan Serreze  
**Phone:** 303-966-2677

**Regulatory Contact:** Carl Spreng, Elizabeth Pottorff, Dave Kruchek, Harlen Ainscough  
**Phone:** 303-692-3300

**Agency:** CDPHE

---

**Purpose of Contact:** Consultative Process Meeting-- Meeting Notes

---

**Discussion**

---

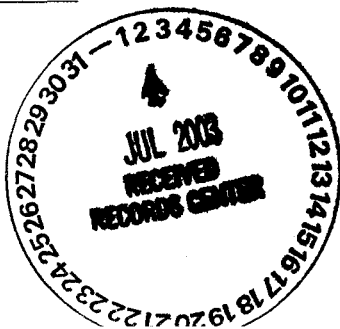
**May 15, 2003 Comment Resolution Meeting  
for  
IHSS Group 000-1 Closeout Report  
IHSS Group 600-1 Closeout Report  
IHSS Group 400-3 Draft IASAP Addendum  
IHSS Group 500-2 Draft IASAP Addendum  
Subsurface Soil Risk Screen**

A meeting was held on May 15, 2003 to discuss several draft reports including the IHSS Group 000-1 Closeout Report, IHSS Group 600-1 Closeout Report, IHSS Group 400-3 Draft IASAP Addendum, IHSS Group 500-2 Draft IASAP Addendum, and the subsurface soil risk screen.

**I. Attendees:**

CDPHE: Dave Kruchek, Elizabeth Pottorff, Carl Spreng, Harlen Ainscough  
DOE: Norma Castaneda  
K-H Team: Gerry Kelly, Mark Ruthven, Susan Serreze

**II. Report Status**



1  
DOCUMENT CLASSIFICATION  
REVIEW WAIVER PER  
CLASSIFICATION OFFICE  
105-01

**ADMIN RECORD**

IA-A-001486

CDPHE was asked when comments on the Characterization Data Summary Report for IHSSs 165 and 176 would be ready. Carl Spreng stated that he would send comments soon.

### III. Issues

In accordance with the proposed RFCA Modification, there are Closeout Reports and Data Summary Reports. At the suggestion of CDPHE, reports that contain data but are not intended to support an accelerated action decision will be called "Characterization Data Summary Report".

CDPHE changes to the Subsurface Soil Risk Screen were discussed and the Subsurface Soil Risk Screen for IHSS Group 600-2 was modified.

### IV. Specific Comments

#### **IHSS Group 000-1 Closeout Report**

The following resolutions were agreed to:

1. The Executive Summary will be changed to clarify what activities were conducted in accordance with ER RSOP Notification #02-08.
2. A comparison to proposed ALs will be added to the Executive Summary.
3. "Duct" will be changed to "dust" in the second to last sentence of the 4<sup>th</sup> paragraph in the Executive Summary and the reference to air monitoring will be removed.
4. Section 1.0 will clarify that the ponds themselves were not within the scope of this action.
5. Results will be compared with the proposed ALs in Section 2.0. In addition, the text will state that exceedances of the Ecological Receptor will be investigated under the IA Ecological Risk Assessment process.
6. Information on the depth of pipelines removed and the extent to which remaining lines were grouted will be provided, where available in Section 3.0. Analytical results of incidental water analyses will not be included. Because water removed was combined in poly-tanks, results cannot be traced to specific sources. In addition, results were not used to make remediation/NFAA decisions.
7. Figure 4 and Table 4 will be reviewed and corrected, as appropriate to include all sampling locations.
8. The title of Figure 5 will be corrected to indicate that the data are characterization results greater than background means plus two standard deviations or detection limits.

9. A statement will be added to Section 4.0 stating that the hot spots were designated based on current RFCA Tier I and Tier II ALs. Confirmation sampling results will not be compared to proposed WRW or ecological ALs in this section because the remediation was confirmed by comparison to Tier I and Tier II ALs. This comparison is generally made in several other locations in this document in accordance with agreements. A statement will be added indicating that further AL comparisons are in the "Residual Contamination" section. Additionally, a statement indicating what analytes are greater than RFCA Tier II ALs, will be added.
10. Section 5.0 will be revised to include reference to the RCRA Units and associated samples.
11. Confirmation sampling was conducted where contaminated soils were removed and all confirmation sampling results were reported. Other areas sampled (e.g., underneath items removed) yielded characterization results, and these are reported in Table 4 and Figure 5. Waste characterization results are presented in Table 14. However, because similar wastes were combined in containers, results can not be traced to specific sources and were not used to make remediation/NFAA decisions. No text changes are required.
12. Information on the depth of remaining pipelines and their construction material will be provided in Section 6.2, where available. Sections 3 and 9 discuss the disposal of water encountered during removal activities. Because water removed was combined in poly-tanks, analytical results can not be traced to specific sources and were not used to make remediation/NFAA decisions. Therefore, results were not reported.
13. The analyte group responsible for SOR exceedances will be identified and discussed in Section 8.1. Analytical results will also be compared to the new ALs.
14. The color of the insets will be changed to blue and we will try to take out the crosses in Figures 12 through 15.
15. Section 11.0 and the title clearly state that these samples are no longer representative. No text changes are necessary.
16. Section 13.1 will be changed, as appropriate, to reflect actual work performed under ER RSOP Notification #02-08 and related characterization results. The DQA section is being modified using the newly agreed-to DQA model. DERs will be included where the SWD data permits.

### **IHSS Group 600-1 Closeout Report**

1. Comparison of results to proposed WRW and ecological ALs was added in the executive summary.
2. Request for NFAA concurrence was added to Section 1.
3. Information on the disposition of concrete from B663 will be added, if available, to Section 2.3.2. Only asphalt associated with concrete removal was removed. Asphalt

remains at the southeastern corner of the site. A map showing removed features is being developed.

4. The text in Section 2.4 was changed to reference Figure 6.
5. Table 8 will be updated to reflect all waste data available.
6. Soil from the hot spot excavation was loaded into crates for disposal. If the data are available, the waste information in Table 8 will be better associated with field activities.
7. A new map is being developed that will show features removed and remaining.
8. Figure 7 was modified so that locations with contamination greater than background or MDL are yellow and those less than background or MDL are gray.
9. Comparison of results to proposed WRW and ecological ALs was added to Section 3.
10. The in-process confirmation data is in Tables 5 and 6.
11. An AL comparison is not included in the stewardship evaluation.
12. Sample depth information was added to Table 9. All results are for surface soil except at one location. Sample depth will be added to Figure 7 for the one subsurface location.
13. The DQA Section is being revised in response to CDPHE comments.

#### **IHSS Group 400-3 IASAP Addendum**

1. "UBC" will be replaced with "buildings" in Section 1.2, page 2, third paragraph, fourth sentence and in Item 1.
2. The use of the 22-meter grid was approved by CDPHE. Additional biased samples will be collected, as necessary. Additionally, when in the building, the opportunity to collect additional samples offset from the original under building characterization effort will be considered, based on actual conditions.
3. Tanks 4, 5, and 6 and OPWL leaks P-5-1 and P-5-2 will be distinguished on Figure 1.
4. Only results that exceed background means plus two standard deviations or detection limits are shown on figures. Additionally, only data of "decision-making quality" are plotted. Other data are used as information in defining COCs. Soil outside of Building 444 and IHSS Group 400-3 will be characterized as part of IHSS Group 400-6. Text will be added that states that soil outside of Building 444 and IHSS Group 400-3 will be characterized as part of IHSS Group 400-6.
5. In this case, it is believed that the tank shapes do not accurately represent the true locations of the tanks. The bias samples within the building were placed at the

OPWL tanks relative to photographs and actual site visits prior to the preparation of the SAP Addendum. Table 3 will be updated to include sampling depth

6. The samples for OPWL tanks were included in the UBC bias samples (found on Figure 5 and in Table 4). These specific samples can be identified in a table that presents the bias sample rationale. Table 3 will be updated to provide more detail.
7. Figure 2 will be changed to provide the correct AL for di-n-butylphate.
8. VOCs are in Table 2 for this IHSS. There are no drains in this area.
9. Analyses of soil for pH have not proven instructive at other sites. There are no ALs for pH. However, VOCs will be added to the PCOC for IHSS 136. The depth that will be sampled will be 0.5' to 2.5'.
10. RFETS staff is presenting as much information as is known. Statistical sampling will be the most effective sampling strategy for finding contamination at IHSS 136.2. RFETS staff will try to determine the exact location and depth of the pond.
11. PCOCs for OPWL leaks are radionuclides and metals. VOCs will be added at these locations.
12. As stated in the addendum, proposed sampling locations are the starting point for characterization. Additional samples will be taken as needed. VOCs will be added if field instrumentation indicates that VOCs are present.
13. Laboratory methods in Table 3 will be reviewed and corrected.
14. Two additional samples will be added west of the boundary of 400-116.2.
15. The concrete dock is so thick, it is hard to core through and likewise, hard for contamination to migrate through. RFETS staff has been unable to locate "the pit" or any signs of its existence. Building personnel have been consulted as well as others. The surface of the dock was sampled during the RLCR and results indicated no presence of contamination. The area of the reported spills was cleaned after the spill. There are UBC samples in this location
16. Soil surrounding UBC 444 will be sampled as part of IHSS Group 400-6.
17. OPWL will be sampled in accordance with the proposed RFCA modification. All other OPWL areas of interest are in the building; therefore, they appear in the UBC samples. Table 3 will be updated to clarify.
18. Additional detail will be added to Table 3 to provide a sampling rationale.

19. These items are included where available. Existing drawings are not always accurate. Many of these features are identified during building walkdowns. These features will be identified in Table 3.

#### **IHSS Group 500-2 IASAP Addendum**

1. The text will be changed to say that existing data "may be used".
2. Building 551 is not a UBC and not part of IHSS Group 500-2. Additional text will be added to justify why samples will not be collected under the building.
3. The dock area is shown on the figures and will be identified. A biased sample will be added in the dock area.
4. The rail line runs along the western side of the building. There are several samples located along the rail line. The rail line will be added to the maps.
5. Sampling locations CA41-034 and BZ42-003 are very close to the northern end of Building 551. To our knowledge, a dock has not existed on the north side of the building.
6. The approximate outline of the detention pond will be drawn in on the maps.

#### **IV. Meetings**

The next meeting is scheduled for Thursday, May 29, 2003 from 10:30 AM to 12:00 PM.

---

#### **Distribution:**

H. Ainscough, CDPHE  
S. Gunderson, CDPHE  
D. Kruchek, CDPHE  
E. Pottorff, CDPHE  
C. Spreng, CDPHE  
T. Rehder, USEPA  
G. Kleeman, USEPA  
N. Castenada, RFFO  
R. DiSalvo, RFFO  
R. McCallister, RFFO  
S. Surovchak, RFFO  
R. Tyler, RFFO

L. Brooks, K-H ESS  
M. Broussard, K-H RISS  
L. Butler, K-H RISS  
R. Davis, K-H RISS  
C. Deck, K-H Legal  
D. Mayo, K-H RISS  
J. Mead, K-H ESS  
S. Nesta, K-H RISS  
L. Norland, K-H RISS  
K. North, K-H ESS  
A. Primrose, K-H RISS  
D. Shelton, K-H  
K. Wiemelt, K-H RISS

K. Griggs, K-H Team  
G. Kelly, K-H Team  
S. Luker, K-H Team  
D. Radtke, K-H Team  
D. Reeder, K-H Team  
M. Ruthven, K-H Team  
S. Serreze, K-H Team  
T. Spence, K-H Team  
E. Woodland, K-H Team  
Administrative Record  
ER Meeting Minutes